

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

SIX DIMENSIONS, INC.,

*Plaintiff,*

v.

PERFICIENT, INC. and  
LYNN M. BRADING,

*Defendants.*

Case No. 1:15-cv-08309-PGG

**DEFENDANT PERFICIENT, INC.'S OBJECTIONS AND  
RESPONSES TO PLAINTIFF'S SECOND SET OF INTERROGATORIES**

COMES NOW Defendant Perficient, Inc. ("Defendant"), by and through its undersigned attorneys, and for its objections and responses to Plaintiff's Second Set of Interrogatories, states as follows:

**INTERROGATORIES**

4. Please state the dates of visits to New York by Jeanette Gomez from January 1, 2013 to present.

**RESPONSE:** None.

5. Please state the offices of Perficient, Inc. that Jeanette Gomez worked out of from January 1, 2013 to present.

**RESPONSE:** Jeanette Gomez worked from her home office. The address is 1806 Cattle Drive, Cedar Park, Texas 78613.

6. Please identify those that worked with, cooperated with or collaborated with Jeanette Gomez or anyone else, either directly or indirectly in the recruitment, solicitation, interviewing and/or communication with anyone that was an employee of Plaintiff at the time.

**OBJECTION:** Defendant objects to Interrogatory No. 6 to the extent it is overbroad in time as it is not limited to the time period at issue in this lawsuit, and seeks information which is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

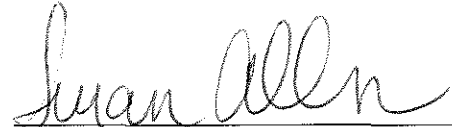
**RESPONSE:** Subject to and without waiving said objections, for the period January 1, 2012, the following individuals participated in the recruitment, solicitation, interviewing, or communication with individuals who were employees of Plaintiff at the time:

<i>Name</i>	<i>Address</i>
Sean Roy	5415 Aspen Street Houston, TX 77081 (Office)
Robert Sumner	15935 Viney Creek Dr. Houston, TX 77095 (Office)
Ed Hoffmann	100 North 6th St., Suite 850B Minneapolis, MN 55403 (Office)  13709 Coyote Court Minnetonka, MN 55305 (Home Office)
Jennifer Jobin	100 North 6th St., Suite 850B Minneapolis, MN 55403 (Office)  13198 Danube Lane Rosemount, MN 55068 (Home Office)
Laura Merkle	129 W. Trade St., Suite 1630 Charlotte, NC 28202 (Office)  946 Garden District Drive Charlotte, NC 28202 (Home Office)
Rojesh Shrestha	9701 Meyer Forest Dr., #11104 Houston, TX 77096 (Office)
Greg Dawson	8501 Merlin Dr. Houston, TX 77055 (Office)

<i>Name</i>	<i>Address</i>
Anoop Srikar	4530 Idlewood Drive Cumming, GA 30040 (Office)
Anton Zuponic	497 Kuntz Drive Independence, MN 55359 (Office)
Vamsi Vasireddy	4950 Stevenson Blvd., #91 Fremont, CA 94538 (Office)
Michael Spicer	2305 NE 44 <sup>th</sup> Ave. Portland, OR 97213
Avanish Gandhi	5293 Shamrock Common Fremont, CA 94555 (Office)
Shannon Sumner	172 Largess Lane Piedmont, SC 29673 (Office)
Dan Klco	850 Academy Drive Cincinnati, OH 45205 (Office)
Lynn Brading	6523 Tree View Drive Liberty Township, OH 45044 (Office)
Aaron Price	807 Sabino Court Cincinnati, OH 45231 (Office)

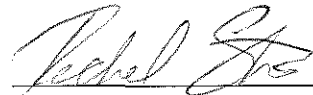
**VERIFICATION**

Susan Allen, of lawful age, being first duly sworn on oath, deposes and says that she has read the foregoing Answers to Second Interrogatories, know the contents thereof, and that the statements and allegations therein contained are true and accurate to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Susan Allen

STATE OF MISSOURI     )  
                                      ) ss  
COUNTY OF ST. LOUIS    )

Subscribed and sworn to before me, this 10 day of February, 2016.

  
\_\_\_\_\_  
Notary Public

My Commission Expires: January 2, 2019



Respectfully submitted,

LOWENBAUM LAW

/s/ Christopher M. Sanders

Christopher M. Sanders, MO #55198

*Pro Hac Vice*

David P. Frenzia, MO #60440

*Pro Hac Vice*

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*Attorneys for Defendant Perficient, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that I have on February 9, 2016, served a true and correct copy of the foregoing via email upon the following:

John P. Bostany, Esq.

Charen Kim, Esq.

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*Attorneys for Defendant Lynn Brading*

/s/ Christopher M. Sanders

/kds